

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**NETTIE Y. DAVIS**

**PLAINTIFF**

**VERSUS**

**CAUSE NO. 3:21-cv-616-DPJ-FKB**

**MICHAEL WATSON, Secretary of State of the  
State of Mississippi, in His Individual and Official Capacities**

**DEFENDANT**

---

**PLAINTIFF’S RESPONSE IN OPPOSITION TO DEFENDANT  
MICHAEL WATSON’S MOTION TO EXPEDITE  
MOTION TO STAY PROCEEDINGS [6]**

---

Plaintiff Nettie Y. Davis opposes the Motion to Expedite Motion to Stay Proceedings [6] for the following reasons:

1. Defendant filed his Motion to Stay to Stay Proceedings on October 18, 2021 [5], making Plaintiff’s normal response due on November 1, 2021.
2. Plaintiff’s counsel is currently on vacation and will not return until Friday, October 22, 2021.
3. During the week of October 25, 2021, the undersigned has the following commitments:
  - A. Preparation for and attendance at oral argument before the Mississippi Court of Appeals in the case styled *Cromwell v. Williams, et al.*, No. 2020-CA-742-COA, set for October 26, 2021;

B. Preparation for and attendance at oral argument before the Mississippi Supreme Court in the case styled *Saunders v. NCAA*, No. 2020-CA-01146-SCT, set for October 27, 2021, at 10:30 a.m.; and

C. Preparation for and attendance at a motion hearing in the case styled *United States of America v. Johnson*, U.S.D.C. Nos. 3:20-CR-00098-DPJ-FKB and 3:21-CR-00095-DPJ-FKB, set for October 27, 2021, at 2:30 p.m.

4. Plaintiff's counsel reasonably needs at least until the normal response time of November 1, 2021, within which to respond to Defendant's motion.

5. As this motion is self-explanatory, Davis requests to be relieved of submitting a supporting memorandum.

WHEREFORE, Plaintiff Nettie Y. Davis requests Defendant's Motion to Expedite Motion to Stay Proceedings be denied, and that she be allowed the normal response time of November 1, 2021, in which to file her response to Defendant's motion.

RESPECTFULLY SUBMITTED, this the 19th day of October, 2021.

NETTIE Y. DAVIS, Plaintiff

By: /s/ JIM WAIDE

Jim Waide, MS Bar No. 6857  
[waide@waidelaw.com](mailto:waide@waidelaw.com)  
WAIDE & ASSOCIATES, P.A.  
332 North Spring Street  
Tupelo, MS 38804-3955  
Post Office Box 1357  
Tupelo, MS 38802-1357  
(662) 842-7324 / Telephone  
(662) 842-8056 / Facsimile

ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

This will certify that undersigned counsel for Plaintiff has this day filed the above and foregoing with the Clerk of the Court, utilizing this court's electronic case data filing system (CM/ECF), which sent notification of such filing to the following:

Gerald L. Kucia  
MISSISSIPPI ATTORNEY GENERAL'S OFFICE  
550 High Street, Suite 1100  
P. O. Box 220  
Jackson, MS 39205  
Email: gerald.kucia@ago.ms.gov

DATED, this the 19th day of October, 2021.

/s/ **Jim Waide**  
JIM WAIDE